



July 31, 2017

Ann E. Misback
Secretary, Board of Governors
The Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551

Re: Request for Public Comment Regarding the Availability of Funds and Collection of
Checks, Regulation CC
Docket No.: R-1564

Dear Ms. Misback,

The Ohio Credit Union League (OCUL) welcomes the opportunity to submit comments concerning the Federal Reserve's request for comment regarding Regulation CC and the availability of funds and collection of checks.

We support the proposed change establishing a presumption in favor of the payee financial institution when there is a dispute as to whether a check has been altered or forged, and the original paper check is not available for inspection. On behalf of Ohio's 287 credit unions, we appreciate the Federal Reserve's initiative clarifying certain operating rules pertaining to electronic check deposit systems. As noted, technological advances reduce the instances where an original check is available for inspection.

OCUL agrees that imposing the risk of loss on the depository credit union is appropriate for today's environment, considering the depository credit union has the ability to retain the original check, whereas the payee institution could not demand presentment of the original check. The depository credit union has the relationship and requisite contact information, which facilitates the ease of obtaining the original check. Electronic deposit systems are not necessarily available to all members of the particular financial institutions. It is the depository institutions' responsibility to determine which members have the necessary relationship with the institution to receive such benefits. As an example, certain members who have second-chance checking accounts may not have the ability to make electronic deposits. As noted by the Federal Reserve, the risk of loss should be imposed on the depository credit union.

The Federal Reserve also requested comments on the frequency of forged checks in comparison to altered checks. The general consensus among Ohio's credit unions is that the presentment of forged checks occur as a method of fraud more frequently than the presentment of fraudulently altered checks.

We urge the Federal Reserve to adopt the proposed rule. On behalf of Ohio's 287 credit unions and their nearly 3 million members, we applaud your agency's proposal to implement common sense regulations that benefit financial institutions. If you have further questions or would like to discuss OCUL's comments in more detail, please feel free to contact me at 614-923-9762.

Thank you for your consideration and the opportunity to provide industry feedback.





OHIO CREDIT
UNION LEAGUE

Respectfully,

Paul L. Mercer
President
Ohio Credit Union League

Miriah Lee
Manager of Policy Impact
Ohio Credit Union League

cc: Christine Blake, OCUL Chair
Barry Shaner, OCUL Government Affairs Committee Chair
Jim Nussle, Credit Union National Association



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